

March 13, 2016

***Draft Recommendations Report to the Legislature on Landscape Water Use Efficiency  
Comments by the Association of Professional Landscape Designers (APLD)***

REVISED COMMENTS: Association of Professional Landscape Designers - California Chapter

This document represents an expansive beginning to a process that will need to combine common sense solutions, open stakeholder engagement, practical workforce development, and educational opportunities toward a cohesive and effective response to our ongoing watershed crisis. Our comments are offered from the practical use-case perspective of primarily residential landscape designers, who provide services to single family property owners. Our membership includes contractors and landscape architects who also provide design services for commercial, civic, and industrial landscapes. We advocate for the watershed approach in all California landscapes.

Recommendations for the residential sector must reflect the practical definition and application of residential landscape design, installation, and maintenance standards to achieve the watershed approach in all landscapes, no matter how small.

**Section 3: ITP Vision Statement**

We find the vision statement compelling and inspirational:

“A growing movement of landscapers and gardeners treat rainwater and stormwater as resources to be used on site, rather than as a nuisance to be quickly expelled from the property. And the remarkable enthusiasm for participation in turf conversion rebate programs is a sign that significant public interest is already here for making this transition.”

As the recommendations in this draft are weighed, codified, and implemented, we urge consideration of these questions:

- 1) *“how does this recommendation support a growing movement of Landscape Professionals dedicated to completely transforming the way we treat our landscapes in California?”*, and
- 2) *“does the recommendation inadvertently restrict the emergence of a strong, diverse workforce dedicated to this mission and movement?”*

Where the answer is unclear, we encourage the committee and the legislature to adopt and promote those actions and strategies that bring *all* players and influencers to the aid of the cause. Any effort that leads us toward greater water security, as well as the innumerable other benefits, including habitat protection and restoration, stormwater pollution prevention, and climate-appropriate landscapes, are efforts we support.

On a daily basis, our members design, implement, educate, and advocate for the aesthetic and approach required to make our residential landscapes resilient contributors to health, security, and sustainability in our state. From this perspective, we respectfully offer these comments, listed by section.

#### **Section 4: Voluntary Turf Replacement**

##### **Recommendation #1: Turf Replacement Incentive Program**

We support this recommendation, with the following changes:

1. Eliminate the phrase “Turf Replacement” and instead use the phrase “Landscape Conversion Incentive Program”. Turf itself is not the cause of outdoor water waste. It is cool-season turf, other high water use plants, compacted and depleted soils, and inefficient irrigation systems that contribute to the waste of potable water in the landscape.

Warm-season and native turf blends, which are efficiently irrigated and established, have a place in the watershed approach, as does any low water use, non-invasive plant. Where low-water use turf is specified in landscape areas, species diversity should be encouraged in additional planting areas, edges, or transitions.

2. Require that a portion of the single-family tax credit apply to design services, as well as materials and labor. See the Contra Costa Water District [“Landscape Design Assistance”](#) program as an example of a highly successful model for this strategy, in need of more available designer/educators. We recommend a minimum 2-hour design consultation for the purpose of educating consumers on the prescriptive (Section D) amendment to the MWELo.

#### **Section 5: Improvements in Existing Landscapes**

##### **Recommendation #2: Landscapes Over One Acre**

We support this recommendation, and further suggest that automated metering Infrastructure should become widely adapted as soon as it is practicable, throughout the state, so that landscape water use can be accurately measured and budgeted. We also recommend that the cap on residential Turf Replacement Incentive Programs (Section 4) be extended on a per-acre basis for retrofits greater than one acre, and that design assistance be included in these incentive programs, for up to 20% of the credit.

We suggest amending Recommendation (e) (3) as follows, with additions underlined:

- (e) Each landscape irrigation report shall include the following:
  - (1) Irrigation system overview: water meter number and type (if existing), assessor parcel number, irrigation zone map, zone description, plant factor by zone (MWELo defaults).
  - (2) Water budget as defined in MWELo: gallons per minute per zone, operating pressure by zone, expected peak month consumption.
  - (3) List of responsible parties: owner, landscape designer, landscape contractor, property manager, or agent designated by the property owner.

We would also support substitute language for (e) (3):

“List of responsible parties: owner, property manager, or an EPA WaterSense Certified Auditor.”

This substitute language includes those individuals who are trained and certified to complete an audit. There is no reason why home inspectors cannot easily gain the skill to become EPA WaterSense Certified Auditors, or hire such individuals to complete third-party irrigation system inspections using a prescribed method. Data collection is undergoing an unprecedented revolution, and creation of tools for implementation of standard audits should be included in the key strategies for implementation.

#### **Section 6: State Model Water Efficient Landscape Ordinance (MWELo) Future Revisions & Process Updates**

##### **Recommendation #1: MWELo Future Revisions for the Next Review Cycle**

Regarding the Public Education section, §492.17(a)2 (b)2, “How to Hire Trained Landscaped Professionals”, we propose the following small but important change in the language:

Information available shall include detailed specifications information on how to hire trained and about landscape professionals, including licensed landscape architects, licensed contractors, landscape designers, irrigation system auditors, and maintenance workers qualified to implement the provisions of MWELo, through training and certification. and the benefits of using such professionals. Included will be the benefits of finding the right professional for the best outcome, with “for your gardener” information to promote the use of mulch, compost and the importance of soil health.

#### **Section 6: MWELo Future Revisions & Process Updates**

Recommendation #2: MWELo Revision: Aligning with Calgreen

We support this recommendation, along with Section 6: State Facility Leadership, including the hiring provisions for workforce professionals.

#### **Section 7: Complementary Policies**

Recommendation #1, A-1B:

We support these recommendations.

#### **Section 7: Complementary Policies**

Recommendation #2: Permit Required for Irrigation Installation

We support item (a) (2), with the following addition:

(c) Residential landscape permits may be submitted by owner, landscape contractor, property manager, or any other agent designated by the property owner,

#### **Section 7: Complementary Policies**

Recommendation #5: Plant Labeling

Plastic label tags individually inserted into plant containers will lead to the unintentional consequence of site and water pollution. We recommend that the labels themselves adhere to the pots, that they contain little or no plastic, and that any labels be affixed to the container, not inserted as a stand-alone plastic tag. There are opportunities to explore QR or other mobile apps to streamline processes.

For projects that already require application of the WELo and a WELo audit, we recommend that the required planting plan, hydrozone plan, and any other required MWELo data, plans, and plant schedules be allowed to serve as a substitute for onsite plant labeling.

We respectfully suggest that any qualified MWELo auditor can be expected to have skill and knowledge in plant nomenclature, identification, and water use data so as to make professional assessments of any properly documented MWELo project without the need for labels affixed to individual plants.

## **Section 8: Workforce to Accomplish This Transformation**

### **Recommendation #1: Certification of Professionals**

The MWELO has the flexibility to lead to development of a workforce to achieve the goals of the ITP Vision Statement. We support development of a certification to recognize submittal of WELO packages in any jurisdiction. This clarifies the issue for the purposes of this committee report. We are eager to participate in the public process referred to in Recommendation #4, as named and recognized stakeholders and participants.

We would oppose any certification designation that requires the qualified individual to design or consult under the control of a state licensed third party—in this case the holder of a C-10 license—who cannot operate without the direct supervision of the C-10 license holder.

At the same time, many C-27 license holders (including a fair number of our members) will benefit from development of this workforce, as will CA Landscape Architects. The key issue for this committee is the clarification of qualification for submittal of MWELO packages and MWELO Audits. For this plan to take flight rapidly, these tasks and duties should be recognized as a legitimate part of the unlicensed and legal professional landscape designer.

A standalone certification program for “business owners” is not only confusing but would dampen market mechanisms, defer accountability, and inhibit entrepreneurial shifts in the marketplace by independent practitioners.

Community colleges, and the wide array of training opportunities for meaningful, rapid, adaptation and change are a natural place to direct significant funding to develop and deliver programs that prepare students for professional certification.

As to Recommendation #6, we strongly encourage coordination of any certificate programs with the broad array of existing organizations already ably delivering respected state and national certification programs: G3, Green Gardens Group; Bay-Friendly Landscaping and Gardening; Eco-Landscape California; Qualified Water-Efficient Landscaper, and more.

We do not have the luxury of time to come up with a whole new state-run certification program, and strongly recommend that the committee and the legislature embrace existing well-respected sources of professional training and certification.

## **Section 8: Workforce to Accomplish the Transformation**

### **Recommendation #2: Examination Questions Covering Water Use Efficiency and Sustainable Practices**

We support actions on the part of any professional associations, such as the California Landscape Contractors Association, to ensure that examinations for existing licensing and certification reflect the latest in the watershed approach.

## Section 9: Public Perceptions & Social Norms

### Recommendation #1 Defining Professionals: Recognition of Examples of Low Water Use Landscapes and a Sustainable Statewide Approach to Outreach and Information

We strongly object to the highlighted language in the Background Statement.

The differences between landscape designers, Landscape Architects, Landscape Contractors, garden centers and irrigation professionals is typically not known or clear to homeowners in need of landscape services. Often and unknowingly, homeowners turn to unlicensed operators using cost to determine who to hire. The end result is often a landscape that is not designed and installed to industry standards, and therefore, not as water-efficient or aesthetically pleasing as desired.

*A license*, in and of itself, is no arbiter of taste or, for that matter, water efficiency. Were this the case, every commercial and civic landscape in California would already be both water efficient, and aesthetically pleasing.

We offer the following substitute language:

The differences between Landscape Designers, Landscape Architects, Landscape Contractors, Garden Centers, Irrigation Professionals, and Landscape Maintenance Professionals is typically not known or clear to homeowners property owners in need of landscape services.

Property owners require the education, advice, and guidance of qualified landscape professionals, at a price they can afford. Clear definition of standards and practices can guide property owners to determine the scope of services they require, and the best landscape professional for the job.

Please note that the background statement looks forward in its recommendations for the Save Our Water website. The success of the Save Our Water campaign is indisputable. Our own forward-looking suggestions here are intended to support the next wave of communication needed for rapid adaptation.

The existing Save Our Water website provides examples of low water using landscapes from throughout the State and includes dialogue from the owners of the properties. ~~However, additional information would increase the website's usefulness.~~ Revision of the website through a watershed lens would increase the website's usefulness, ensure consistency with the MWELQ, and strengthen the drive toward a new aesthetic. Included should be a review and removal of aesthetically pleasing but habitat-damaging horticultural invasives.

~~That information~~ Landscape profiles includes details about the landscape, including before and after photos, how the landscape was designed, a list of the plants used, irrigation system information, type of hardscape features and material used, type of mulch, and whether the installation was done by the homeowner or a professional. ~~In addition, a methodology for a sustainable (long-term) approach to educate and communicate to homeowners with respect to the items discussed above, including information on how to identify the appropriate landscape professional for each type of project, should be developed.~~ Additional information for landscape profiles could include how compost and mulch are used as a water-saving and soil-building practice.

## **Section 10: Research and Documentation Needs and Support**

We recommend that the Legislature appropriation for this research focus on a holistic, watershed approach to California landscapes, to include standards, data, and research on the importance of residential landscapes. The state has an opportunity to leverage the age of Big Data. Standardized data sets, streamlined reporting, and evaluation of water saving measures are all now attainable in our mobile age.

An example is the WaterSmart technology, which could be leveraged by certified professionals as a resource and reporting mechanism, lessening the burden on local agencies. We encourage the development of additional data sets such as mulch, compost, and stormwater element to complete the picture. The WaterSmart model interface makes data entry easy and fun.

## **Section 10: Research and Documentation Needs and Support**

### **Recommendation #2: Water Use Classification of Landscape Species (WUCOLS)**

We respectfully request that APLD California Chapter have a seat at the table for recommendations, support, and provision of key cultural information, data acquisition, and development of technology and tools to achieve the goals of this recommendation. We are especially interested in clarifying establishment criteria for summer-dry plant, and a strong visual component to the WUCOLS database.

## **Key Strategies for Workforce Transformation**

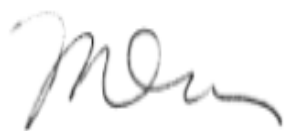
We support “new standards for accreditation”, but strongly oppose establishment of an “apprentice approach” for accreditation of landscape designers. The goal is to grow a workforce movement, not dampen or delay the emergence of the very professionals who provide design services for residential homeowners—a key market sector for adaptation of the watershed approach.

We are strongly in favor of developing technical educational curricula through the community college system and beyond, to focusing on the watershed approach and meeting the goals of the MWEL0. An overall language change is also recommended for greater clarity. Please consider “Landscape Professional” to replace the word “Landscape” when you describe the vast community of individuals who must have a hand in the rapid implementation of this report’s best ideas.

We wholeheartedly embrace the *Watershed Approach to California Landscapes*, and applaud the ITP for your commitment to the vision statement in this document.

Thank you for receiving these comments, and for the opportunity to participate in the ITP process.

Sincerely,



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